

JMM:JJD:BTR
F.#2009R00494

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CHRIS ORSARIS,

Defendant.

- - - - -X

THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO LAUNDER MONEY

1. On or about and between January 1, 1999 and March 29, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRIS ORSARIS, together with others, did knowingly and intentionally conspire to conduct one or more financial transactions affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, to wit: (i) uttering forged checks, contrary to Title 18, United States Code, Section 513; (ii) mail fraud, contrary to Title 18, United States Code, Section 1341; and (iii) wire fraud, contrary to Title 18, United States Code, Section 1343, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity: (a) with the intent to promote the carrying on of the specified unlawful activity, contrary to Title 18, United States

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IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

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LONG ISLAND OFFICE

S U P E R S E D I N G
I N F O R M A T I O N

Cr. No. 10-232(S-1) (LDW)
(T. 18, U.S.C., §§
982(a)(1), 982(b)(1),
1956(h) and 3551 et seq.)

Code, Section 1956(a)(1)(A)(i); (b) with intent to engage in conduct constituting a violation of Sections 7201 and 7206 of the Internal Revenue Code of 1986, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(ii); (c) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and (d) to avoid a transaction reporting requirement under State and Federal Law, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(ii).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant charged in the Superseding Information that, upon conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), of all property involved in such offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, and all property traceable to such property, including but not limited to, the following:

Money Judgment

A sum of money equal to \$4,669,772.24 in United States currency.

Specific Property

a. All right, title and interest in the real property and premises located at 1-15 Samos Lane, Whitestone, New York and all proceeds traceable thereto;

b. All right, title and interest in the real property and premises located at Residential Unit No. 79A in the building known as The Trump World Tower, located at 845 United Nations Plaza, New York, New York and all proceeds traceable thereto;

c. All right, title and interest in the real property and premises located at 101 Parrish Pond Court East, Southampton, New York and all proceeds traceable thereto;

d. All right, title and interest in the condominium located at 101 20th St., Apartment 2606, Miami Beach, Florida and all proceeds traceable thereto;

e. All funds on deposit in, or transferred to or through Commerce Bank (now known as TD Bank) account no. 7915014554 held in the name of P.S.C.A. Consultants, Inc., and all proceeds traceable thereto;

f. All funds on deposit in, or transferred to or through, HSBC bank account no. 032557477 held in the name of CHRIS ORSARIS, and all proceeds traceable thereto;

g. All funds on deposit in, or transferred to or through, HSBC bank account no. 942158792 held in the name of P.S.C.A. Consultants, Inc., and all proceeds traceable thereto;

h. All funds on deposit in, or transferred to or through, HSBC bank account no. 032109105 held in the name of CHRIS ORSARIS, and all proceeds traceable thereto;

i. All funds on deposit in, or transferred to or through, HSBC bank account no. 942159977 held in the name of CPMW Consultants Inc., and all proceeds traceable thereto; and

j. All right, title and interest of the defendant in the property known as Major Ford and all proceeds traceable thereto.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

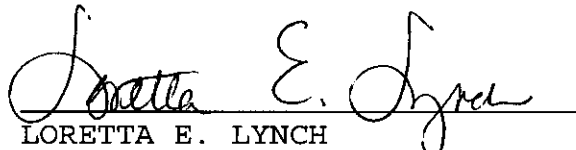
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property, which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant, up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1))


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

SIR:

PLEASE TAKE NOTICE that the within will be presented for settlement and signature to the Clerk of the United States District Court in his office at the U.S. Courthouse, 610 Federal Plaza, Central Islip, New York, on the ___ day of ___, 20___, at 10:30 o'clock in the forenoon.

Dated: Central Islip, New York

___, 20___

United States Attorney,
Attorney for

Attorney for

SIR:

PLEASE TAKE NOTICE that the within is a true copy of ___ duly entered herein on the ___ day of ___, in the office of the Clerk of the Eastern District of New York,

Dated: Central Islip, New York

___, 20___

United States Attorney,
Attorney for

To

Attorney for

Criminal Action No.

**UNITED STATES DISTRICT COURT
Eastern District of New York**

UNITED STATES OF AMERICA

- against-

CHRIS OSARIS,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 982 (a) (1), 982
(b) (1), 1956 (h) and 3551 et seq.)

LORETTA E. LYNCH

United States Attorney
Eastern District of New York
United States Courthouse
610 Federal Plaza
Central Islip, New York 11722

Due Service of a copy of the within ___
is hereby admitted.

Dated: ___, 20___

Attorney for

Burton T. Ryan
Assistant U.S. Attorney (631)715-7853